## EXHIBIT F

From: Kate Swift < kate.swift@bartlit-beck.com>
Sent: Tuesday, September 25, 2018 1:29 PM

To: Laura Dunning

**Cc:** Jeff Gaddy; Kaspar Stoffelmayr; Salvatore C. Badala; Peter Mougey

**Subject:** RE: Walgreens - Eric Stahmann Deposition

Laura,

Mr. Stahmann is available to sit for his deposition on Tuesday, 10/16, in our offices in Chicago.

Katherine M. Swift | Bartlit Beck Herman Palenchar & Scott LLP

54 West Hubbard Street, Suite 300, Chicago, IL 60654
P: 312.494.4405 F: 312.494.4440 C: 773.531.6118
kate.swift@bbhps.com | www.bartlit-beck.com

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**From:** Laura Dunning <a href="mailto:ldunning@levinlaw.com">ldunning@levinlaw.com</a> **Sent:** Monday, September 24, 2018 10:06 AM **To:** Kate Swift <a href="mailto:kate.swift@bartlit-beck.com">kate.swift@bartlit-beck.com</a>

Cc: Jeff Gaddy <jgaddy@levinlaw.com>; Kaspar Stoffelmayr <kaspar.stoffelmayr@bartlit-beck.com>; Salvatore C. Badala

<SBadala@NapoliLaw.com>; Peter Mougey <pmougey@levinlaw.com>

Subject: RE: Walgreens - Eric Stahmann Deposition

Kate,

We agree to accept the dates for Barnes, Mills, Daugherty, and Martin. We will also agree to accept the date for Bratton you offered, subject to your agreement to put Mr. Stahmann up for deposition in the next couple of weeks. We understand you believe the deposition set originally for this Thursday has been postponed, however, we have not seen an order on that and believe it is still set for this week.

Thanks,

Laura S. Dunning 205-396-5014 ldunning@levinlaw.com



From: Kate Swift < <a href="mailto:kate.swift@bartlit-beck.com">kate Swift < kate.swift@bartlit-beck.com</a> Sent: Monday, September 24, 2018 9:29 AM

To: Laura Dunning <ldunning@levinlaw.com>; Peter Mougey <pmougey@levinlaw.com>

Cc: Jeff Gaddy <igaddy@levinlaw.com>; Kaspar Stoffelmayr <kaspar.stoffelmayr@bartlit-beck.com>

Subject: RE: Walgreens - Eric Stahmann Deposition

Laura,

You asked for Mr. Stahmann's deposition for the first time late on Friday. It is now 9:30 am Monday morning. We are still waiting to hear back from the client on his availability.

Please let us know if plaintiffs accept the other deposition dates we have offered. You have had those dates for 11 days.

Katherine M. Swift | Bartlit Beck Herman Palenchar & Scott LLP

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From: Laura Dunning < <a href="mailto:ldunning@levinlaw.com">ldunning@levinlaw.com</a>>
Sent: Monday, September 24, 2018 9:13 AM

To: Peter Mougey pmougey@levinlaw.com
; Kate Swift <kate.swift@bartlit-beck.com</pre>

Cc: Jeff Gaddy < jgaddy@levinlaw.com>; Kaspar Stoffelmayr < kaspar.stoffelmayr@bartlit-beck.com>

Subject: RE: Walgreens - Eric Stahmann Deposition

Kate,

Please let us know where we stand with Mr. Stahmann's deposition.

Thank you, Laura

Laura S. Dunning 205-396-5014 ldunning@levinlaw.com



From: Peter Mougey

**Sent:** Friday, September 21, 2018 10:09 PM **To:** Kate Swift <kate.swift@bartlit-beck.com>

Cc: Laura Dunning <a href="mailto:claura-laural-norm">cc: Laura Dunning <a href="mailto:claural-norm">claural-norm</a>; Jeff Gaddy <a href="mailto:gaddy@levinlaw.com">jgaddy@levinlaw.com</a>; Kaspar Stoffelmayr

<kaspar.stoffelmayr@bartlit-beck.com>

Subject: Re: Walgreens - Eric Stahmann Deposition

We don't have the same interpretation of our conversations w Cohen. We have offered to take the depo of Eric within the next two weeks w the production as it stands now. Ok?

Sent from my iPhone

On Sep 21, 2018, at 10:39 PM, Kate Swift <a href="mailto-beck.com">kate.swift@bartlit-beck.com</a> wrote:

Thanks, Laura. Special Master Cohen has already said that Mr. Bratton's deposition need not go forward in September, as Peter and I discussed yesterday morning. We will not put him up next week.

## Case: 1:17-md-02804-DAP Doc #: 1172-6 Filed: 12/07/18 4 of 4. PageID #: 28657

As for the conversation Peter and I had today, I asked if plaintiffs were willing to depose one of our fact witnesses without a complete custodial file production. Are you?

Have a good weekend, Kate

Katherine M. Swift | Bartlit Beck Herman Palenchar & Scott LLP 54 West Hubbard Street, Suite 300, Chicago, IL 60654 P: 312.494.4405 F: 312.494.4440 C: 773.531.6118 kate.swift@bbhps.com | www.bartlit-beck.com

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From: Laura Dunning < <a href="mailto:ldunning@levinlaw.com">ldunning@levinlaw.com</a>>
Sent: Friday, September 21, 2018 4:11 PM
To: Kate Swift <a href="mailto:kate.swift@bartlit-beck.com">kate.swift@bartlit-beck.com</a>>

**Cc:** Peter Mougey pmougey@levinlaw.com; Jeff Gaddy jgaddy@levinlaw.com; Kaspar Stoffelmayr

<a href="mayr@bartlit-beck.com">kaspar.stoffelmayr@bartlit-beck.com">

Subject: Walgreens - Eric Stahmann Deposition

Kate,

Pursuant to your discussion with Peter earlier today, if Walgreens will agree to put Eric Stahmann up for fact deposition in the next couple of weeks at a time that works for everyone, we will agree to withdraw the notice for Mr. Bratton's September 27<sup>th</sup> deposition.

We are also in receipt of your letter of today identifying certain custodians and personnel. Please provide the dates of their employment with Walgreens, including whether any are no longer in Walgreens's employ.

Thank you,

## Laura S. Dunning

Of Counsel
Securities and Business Litigation
Levin, Papantonio, Thomas, Mitchell,
Rafferty & Proctor, P.A.
205-396-5014
Idunning@levinlaw.com

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